

**DOCKETED**

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<b>Project Title:</b>	2025 Energy Code Pre-Rulemaking
<b>TN #:</b>	253184
<b>Document Title:</b>	CASH & CMN Comments Letter - Heat Pump Flexibility
<b>Description:</b>	Coalition for Adequate School Housing (CASH) CASH Maintenance Network (CMN)
<b>Filer:</b>	System
<b>Organization:</b>	CASH & CMN/Ian Padilla
<b>Submitter Role:</b>	Public
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*Comment Received From: Ian Padilla  
Submitted On: 11/17/2023  
Docket Number: 22-BSTD-01*

## **CASH and CMN Letter - Heat Pump Flexibility**

California Energy Commission (CEC)  
Docket Unit, MS-4  
Docket No. 22-BSTD-01  
715 P Street  
Sacramento, CA 95814

RE: Title-24-20-2025 Express Terms “ Docket No. 22-BSTD-01

Dear Commissioners and CEC Staff:

Thank you for the opportunity to comment on Docket No. 22-BSTD-01 regarding heat pump baselines in Title-24-2025.

The Coalition for Adequate School Housing (CASH) and the CASH Maintenance Network (CMN) are California’s premiere statewide associations representing school facilities and maintenance issues. Since before the COVID-19 pandemic, healthy indoor air quality has been a primary component of CASH’s goal of creating and maintaining safe and healthy educational environments to support 21st century learning, but the pandemic highlighted the need for investments in school HVAC assessment, repair and system replacements.

The California Public Utility Commission’s (CPUC) approval of Net Energy Metering (NEM) 3.0 significantly reduces compensation rates for new solar customers (about 75%) and is a significant disincentive for schools to invest in energy-generation technology. The CPUC’s approval of changes to Net Energy Metering Aggregation (NEMA) will increase both the cost of photovoltaic equipment installation and the ongoing cost for electricity. These increases in energy costs come as schools are also coping with the new mandates requiring the installation of solar panels on many school buildings, the installation of electric vehicle charging infrastructure in parking lots, conversion of vehicle and bus fleets to electric vehicles, and the necessary charging infrastructure. CASH and CMN support the move to all electric HVAC heat pumps in concept as part of the larger effort to achieve the state’s climate action goals for energy efficiency, air quality and heat mitigation.

However, we believe K-12 schools should have the flexibility to utilize hybrid electric/gas HVAC units for the following reasons:

“ California is a large state with many regional climates and environmental variation, so a one-size-fits-all policy that does not recognize exceptions is unwise.

“ Heat pumps used in school modernization/alterations/retrofit projects have a

significant impact on the electrical load of existing buildings and we are concerned about the cost impact of utility upgrades that will likely be required for many of these projects.

â€¢ Like hybrid car technology in the rapid transition from gas-powered to electric powered cars and school buses, we believe an electric/gas hybrid HVAC provides the same type of bridging option as we move to full electric, particularly for small and rural schools with old buildings and less resources.

â€¢ We also believe that staff training to support the transition to all electric heat pump technology is key to long-term success of the program.

For these reasons, CASH and CMN RECOMMEND HEAT PUMP WITH SUPPLEMENTAL GAS HEATING BE INCLUDED IN THE BASELINE FOR NON-RESIDENTIAL ALTERATION.

In conclusion, we appreciate the opportunity to provide comment and recommendations on this important matter for K-12 schools, and we look forward to working with you on school air quality and ventilation policy issues. Please do not hesitate to contact us to provide the critical K-12 school facility and maintenance perspective as policy is developed.

Sincerely,

Ian Padilla, Legislative Advocate  
Coalition for Adequate School Housing (CASH)  
CASH Maintenance Network (CMN)  
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*Additional submitted attachment is included below.*



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- Heat pumps used in school modernization/alterations/retrofit projects have a significant impact on the electrical load of existing buildings and we are concerned about the cost impact of utility upgrades that will likely be required for many of these projects.
- Like hybrid car technology in the rapid transition from gas-powered to electric powered cars and school buses, we believe an electric/gas hybrid HVAC provides the same type of bridging option as we move to full electric, particularly for small and rural schools with old buildings and less resources.
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